

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-17-0614

SONJA MARTINEZ

UNOPPOSED MOTION FOR CONTINUANCE

The Defendant, Sonja Martinez moves this Court for a sixty-day continuance of the sentencing hearing in this case which is currently set for October 3, 2018, and in support of this motion presents the following:

Ms. Martinez was convicted of conspiracy to commit wire fraud in violation of 18 U.S.C. § 371. The Pre-sentence Investigation Report (PSR) in this case was disclosed to counsel on June 14, 2018.

Ms. Martinez was represented by Assistant Federal Public Defender Danielle Touart who is no longer with the Federal Public Defender Office. This case has been reassigned to new counsel. Counsel will need time to review the file, research the issues, and be independently prepare to represent Ms. Martinez at sentencing. This

request is not made for the purpose of delay or to gain unfair advantage, it is made solely so that justice may be done.

Defense counsel has consulted with counsel for the government, Assistant United States Attorney Belinda Beek and she stated she is unopposed to this Motion for Continuance.

The Defendant, Sonja Martinez moves this Court and asks the court to continue the sentencing hearing for sixty days.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By s/ Aisha Japera Dennis
AISHA JAPERA DENNIS
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Belinda Beek, and determined that the United States is unopposed to this motion for continuance.

s/ Aisha Japera Dennis
AISHA JAPERA DENNIS

CERTIFICATE OF SERVICE

I certify that on October 1, 2018, a copy of the foregoing Unopposed Motion to Continue was served by Notification of Electronic Filing and was delivered by email to the office of Assistant United States Attorneys Belinda Beek and Stephanie Coon Bauman at 1000 Louisiana Street, Suite 2300, Houston, Texas 77002, and electronic mail to the Office of United States Probation Officer Deyanira Loredo at 515 Rusk Avenue, 2nd floor, Houston, TX 77002, and to all parties.

s/ Aisha Japera Dennis
AISHA JAPERA DENNIS